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FILED

JUL 20 2011

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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12 UNITED STATES OF AMERICA,) CASE NO. Cr. 09-0862 MHP
13 Plaintiff,)
14 v.) STIPULATION AND
15 SERGEI V. SHKURKIN,) (PROPOSED) ORDER
16 Defendant.) TO MODIFY CONDITIONS OF
17 _____) PRETRIAL RELEASE
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Defendant, Sergei V. Shkurkin, through his counsel, and the United States, through its counsel, hereby stipulate and request that the conditions of pretrial release for Sergei Shkurkin be modified, as follows:

1. Mr. Shkurkin's travel restrictions, which presently allow him to travel within the Eastern and Northern Districts of California without notice to Pre-Trial Services, shall be amended to allow Mr. Shkurkin to travel to Reno, Nevada on July 27 and 28, 2011. The purpose of this is to allow Mr. Shkurkin to participate in work-related activities at the University of Nevada, Reno.

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3 Eastern District of California Pre-Trial Services Officer Beth Baker reports that Mr.
4 Shkurkin continues to be in full compliance with his obligations and she has no objection to this
5 proposed stipulation and order. Northern District Pre-Trial Services Officer Rich Sarlatte's office
6 has also been notified of this proposed order as well.

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All other terms and conditions of Pre-Trial release remain in effect.

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9 IT IS SO STIPULATED.

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11 DATED: July 13, 2011

/s/ Andrew Caputo
ANDREW CAPUTO
Assistant United States Attorney

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13 DATED: July 13, 2011

/s/ William J. Portanova
WILLIAM J. PORTANOVA
Attorney for Defendant Sergei V. Shkurkin

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15 IT IS SO ORDERED.

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DATED: 7/20/11



THE HON. TIMOTHY J. BOMMER
United States Magistrate Judge